

**UNITED STATES FEDERAL DISTRICT COURT  
IN AND FOR DISTRICT OF DELAWARE**

GRAPHIC ARTS MUTUAL INSURANCE  
COMPANY

Plaintiff,

V.

INDIAN RIVER SCHOOL DISTRICT, *et al.*

Defendants.

)
)
)
)
)
)
)
)
)
)

Civil Action No. 06-246-JJF

### NOTICE OF EXTENSION OF WRITTEN DISCOVERY

Pursuant to the Court's Scheduling Order, all parties hereby give notice to the Court that they have agreed to extend the deadline set forth in paragraph 4.a of the Scheduling Order to exchange and complete interrogatories, identify fact witnesses, and produce documents, by sixty days. *See* Rule 16 Scheduling Order at ¶4.a. The new deadline will be February 19, 2007.

The parties have exchanged initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) and have exchanged written discovery requests pursuant to Federal Rules of Civil Procedure 33 and 34, but believe that this short extension will facilitate ongoing settlement discussions. The Scheduling Order permits the parties to extend this deadline “so long as the changes do not cause a delay in any pre-trial conference or trial date set by the Court and so long

as the Court does not otherwise order.” See Rule 16 Scheduling Order at ¶4.g. This extension will not cause a delay with the pre-trial conference and no trial date has yet been set.

Respectfully submitted,

DRINKER BIDDLE & REATH LLP

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Warren Pratt

Warren Pratt (Del. Bar No. 4334)  
1100 N. Market Street  
Suite 1000  
Wilmington, DE 19801  
Telephone: (302) 467-4200  
Facsimile: (302) 467-4201

Jason P. Gosselin (*pro hac vice*)  
DRINKER BIDDLE & REATH LLP  
One Logan Square  
18th & Cherry Streets  
Philadelphia, Pennsylvania 19103  
Telephone: (215) 988-3371  
Facsimile: (215) 988-2757

*Attorneys for the Defendants*

/s/ Timothy Jay Houseal

Anthony G. Flynn (Del. Bar No. 74)  
Timothy Jay Houseal (Del. Bar No. 2880)  
The Brandywine Building  
1000 West Street  
17th Floor  
Wilmington, DE 19801  
Telephone: (302) 571-6675  
Facsimile: (302) 571-1253

Edward J. Grass (*pro hac vice*)  
Steven W. McNutt (*pro hac vice*)  
HUNTON & WILLIAMS LLP  
1751 Pinnacle Drive, Suite 1700  
McLean, Virginia 22102  
Telephone: (703) 714-7400  
Facsimile: (703) 918-4050

*Attorneys for Graphic Arts Mutual Insurance Company*

Dated: November 14, 2006